

Rory Kay (NSBN #12416)
McDONALD CARANO LLP
2300 W. Sahara Ave, Suite 1200
Las Vegas, NV 89102
Telephone: 702.873.4100
Fax: 702.873.9966
rkay@mcdonaldcarano.com

KARLA KRAFT, State Bar No. 205530
kkraft@sycr.com

(Admitted Pro Hac Vice)

KATIE BEAUDIN, State Bar No. 306402

kbeaudin@sycr.com

(Admitted Pro Hac Vice)

STRADLING YOCCA CARLSON & RAUTH
A PROFESSIONAL CORPORATION

660 Newport Center Drive, Suite 1600

Newport Beach, CA 92660-6422

Telephone: (949) 725-4000

Facsimile: (949) 725-4100

Attorneys for Defendant

Gallant Capital Partners, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EI CORPORATION, INC., a Nevada
corporation,

Plaintiff,

vs.

GALLANT CAPITAL PARTNERS,
LLC, a Delaware limited liability
company; QUALITY BUILT, LLC, a
Delaware limited liability company;
and JOHN GILLETT, an individual,

Defendants.

CASE NO. 2:20-cv-01119-APG-NJK

Hon. Andrew P. Gordon

**DEFENDANT GALLANT CAPITAL
PARTNERS, LLC'S JOINDER TO
MOTION TO TRANSFER VENUE**

Complaint Filed: June 24, 2020

1 Defendant Gallant Capital Partners, LLC (“Gallant”) joins in the motion to
 2 transfer venue pursuant to 28 U.S.C. § 1404(A) filed by defendant Quality Built,
 3 LLC (ECF No. 22, the “Motion”) for all reasons stated therein.

4 In support of the Motion and this Joinder, Gallant notes that Gallant’s
 5 principal place of business is in Los Angeles, California. (Compl. at ¶ 6.) The
 6 allegations regarding Gallant center around the Confidentiality and Nondisclosure
 7 Agreement (the “NDA”) entered into between Gallant and Plaintiff for the purpose
 8 of exchanging documents and information in connection with a potential
 9 transaction. (Compl. at Ex. 2.) Pursuant to the NDA, Plaintiff shared documents
 10 with Gallant. (Compl. at ¶ 29.) Plaintiff has placed those documents at issue in
 11 this case, and the documents and information relevant to the allegations against
 12 Gallant, as well as the relevant witnesses, are located in California.

13 Moreover, the NDA is governed by Delaware law. (Compl. at Ex. 2.)
 14 Therefore, Nevada has no greater interest than California in enforcing the terms of
 15 the NDA.

16 Because the relevant documents, information, and witnesses are located in
 17 California, Gallant joins the Motion and requests that this action be transferred to
 18 the Southern District of California, or in the alternative, the Central District of
 19 California.

20
 21 DATED: July 23, 2020

McDONALD CARANO LLP

22
 23 By: /s/ Katie Beaudin

Rory Kay, Esq.
 Nevada Bar No. 12416
 2300 W. Sahara Ave, Suite 1200
 Las Vegas, NV 89102

24
 25 and

26 KARLA KRAFT,
 27 (Admitted pro hac vice)
 KATIE BEAUDIN,
 28 (Admitted pro hac vice)
 STRADLING YOCCA CARLSON &
 -2-

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

RAUTH, A PROFESSIONAL
CORPORATION
660 Newport Center Drive, Suite 1600
Newport Beach, CA 92660-6422

Attorneys for Defendant
Quality Built, LLC